

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Luis Flores,

Plaintiff,

-against -

Index No. 17-CV-2611(ALC)(KNF)

Battery Place Market Corp., SHK Holdings Inc.,
Vicente Millan, and Sung Kim,

Defendants.

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DECLARATION OF PATRICIA KAKALEC

Patricia Kakalec, an attorney duly licensed to practice law in the State of New York and in this Court, declares pursuant to 28 U.S.C. § 1746 that the following is true and correct:

- 1 I am the principal at Kakalec Law PLLC, co-counsel for Plaintiff in the above-referenced action, and, as such, I am familiar with the facts and documents relevant to this dispute
- 2 I previously was a partner with Kakalec & Schlanger, LLP, which represented the Plaintiffs in this case prior to the substitution of my new firm in March 2018.
- 3 I make this Declaration in support of the parties' application for the Court's approval of the settlement in the above-referenced case, and specifically in support of my attorneys' fees rate of \$500 per hour, which is justified here based on my experience and qualifications.
- 4 I am a 1993 cum laude graduate of Harvard Law School. I was admitted to practice in New York State in 1994, and am admitted in all federal courts in the State, as well as in the Second Circuit.
- 5 Following law school, I was a litigation associate with the former firm LeBoeuf, Lamb, Greene & MacRae, LLP.

- 6 After leaving LeBoeuf Lamb, I clerked for two years for the Hon. Denis R. Hurley, U.S. District Judge in the Eastern District of New York.
- 7 Between 1998 and 2004, I was an attorney representing migrant farmworkers throughout New York State, first with the Farmworker Law Project of the Legal Aid Society of Mid-New York, Inc., and then with Farmworker Legal Services of New York, Inc. (“FLSNY”). In these positions, I represented farmworkers, primarily in federal court, in actions related to unpaid wages, unsafe working conditions, illegal recruitment practices, and other violations of law. At FLSNY, my practice included class actions brought on behalf of groups of farmworkers.
- 8 Between 2004 and 2008, I was the founder and Executive Director of the Workers’ Rights Law Center of New York, Inc. (“WRLC”). At the WRLC, I represented low-wage and immigrant workers in individual and class actions related to non-payment of wages, failure to pay overtime, discrimination, retaliation, and other legal violations.
- 9 In 2008, I joined the New York State Attorney General’s Office. I served as the Bureau Chief and the Deputy Bureau Chief of the Attorney General’s Labor Bureau. In 2011, when a new Attorney General took office, I remained at the Attorney General’s Office and served as Special Counsel in the Labor Bureau. During this time I also served as a Chair of the Attorney General’s statewide Equal Employment Opportunity Committee.
- 10 I left the Attorney General’s Office in February 2016, and joined Kakalec & Schlanger, LLP as a partner.
- 11 I began practicing as the principal of Kakalec Law PLLC in March of this year.

- 12 For nineteen of my twenty-four years of legal practice, I have focused on representing workers and the interests of workers in employment matters, first as a legal services lawyer, then in government, and now in private practice.
- 13 During my time at the Attorney General's Office, I represented (and supervised those representing) the People of the State of New York, and the New York State Department of Labor (and its employees), in state and federal labor law cases, a limited sample of which includes:
- (a) *RI, Inc. v. Gardner*, 10-CV-1795 (E.D.N.Y.) Reported decisions: 18 Wage & Hour Cas. 2d (BNA) 361 (E.D.N.Y. Aug. 11, 2011) (Boyle, J.) (granting our motion for a protective order); 889 F.Supp.2d 408 (E.D.N.Y. 2012) (Wexler, J.) (granting our motion for summary judgment), *aff'd* 12-3885-CV, 2013 U.S. App. LEXIS 12950 (2d Cir. June 25, 2013), *cert denied*;
 - (b) *Matter of A. Uliano & Son. Ltd. v. N.Y. State Dep't. of Labor*, New York Appellate Division 2d Dep't, Index no. 2011/02599, Decision reported at 97 A.D.3d 664, 949 N.Y.S.2d 84 (2d Dep't 2012) (administrative determination confirmed and petition denied except as to amount owed to one employee); and
 - (c) *Matter of Ramirez v. Comm'r of Labor of State of N.Y.*, New York Appellate Division 2d Dep't, Index no. 2012-03327, Decision reported at 110 A.D.3d 901, 972 N.Y.S.2d 696 (2d Dep't 2013) (administrative determination confirmed, petition dismissed).
- 14 During my time as a legal services lawyer, I represented low-wage workers in class actions and individual actions, a limited sample of which includes:
- (a) *Iglesias-Mendoza v. La Belle Farm, Inc.*, reported decision at 2008 U.S. Dist. LEXIS 47431, 06-Civ-1756 (S.D.N.Y. June 12, 2008) (denying our adversary's motion to quash);
 - (b) *Centeno-Bernuy v. Perry*, reported decision at 302 F.Supp.2d 128 (W.D.N.Y. 2003) (granting our motion for preliminary injunction); and
 - (c) *Centeno-Bernuy v. Becker Farms*, reported decision at 219 F.R.D. 59 (W.D.N.Y. 2003) (granting our motion for a protective order)

15 At present, I represent employees in individual, collective, and putative class actions
involving claims under the Fair Labor Standards Act in the Southern and Eastern
Districts of New York, the Northern District of Illinois, and the District Court of Kansas.

16 In 2010 I was a Wasserstein Fellow at Harvard Law School, a fellowship awarded for
“outstanding public interest lawyers.” I also was awarded an Echoing Green fellowship
in support of the Workers’ Rights Law Center between 2006 and 2008.

17 I have recently been approved at a rate of \$500 in a Cheeks application in the case
Suenram et al. v. Future Care, Inc. (16-cv-4670 (LTS)(SDA)) (April 18, 2018 Order).

18 In light of my experience and qualifications, an hourly rate of \$500 is reasonable for my
work in this case. *See, e.g., Clover v. Shiva Realty*, 10 cv 1702, 2011 WL 1832581, *5
(S.D.N.Y. May 13, 2011) (approving an hourly rate of \$500 in a FLSA case for attorney
who “has been practicing law for twenty-three years, and has substantial experience in
employment and civil rights cases.”)

19 Fees from my prior firm also include 2.7 hours of paralegal time spent by Miriam
Greenman and Fabiana Nina. Their time is billed at \$100 per hour. Ms. Greenman is an
experienced paralegal who holds a Master’s degree. Ms. Nina is a bilingual paralegal
who holds a Bachelor’s degree from Rutgers University.

Dated: New York, New York
July 3, 2018



Patricia Kakalec

EXHIBIT 1

(Time 1/25/18 – 7/3/18)

1/25/2018	Draft 0.7 discovery	Draft and send deposition notices for all Ds, to D counsel emails w/ D counsel re: deposition dataes	500	\$350.00	Patricia Kakalec
1/26/2018	0.2 Email	Review documents for production; begin draft of document production response and interrogatories	500	\$100.00	Patricia Kakalec
2/7/2018	Draft 2.3 discovery	Call w/ client re: discovery responses, documents	500	\$1,150.00	Patricia Kakalec
2/7/2018	Telephone 0.8 call	Follow up questions to client on discovery	500	\$400.00	Patricia Kakalec
2/8/2018	Telephone 0.3 call	Draft/edit discovery responses, prepare documents for production	500	\$150.00	Patricia Kakalec
2/9/2018	Draft 1.9 discovery	Send discovery to D counsel w/ message	500	\$950.00	Patricia Kakalec
2/9/2018	0.1 Email		500	\$50.00	Patricia Kakalec
2/12/2018	0.6 Meeting	Meet w/ client re: discovery, next steps in case; client signature on interrogatories	500	\$300.00	Patricia Kakalec
2/12/2018	0.1 Email	Send updated discovery to D counsel w/ message	500	\$50.00	Patricia Kakalec
3/1/2018	Draft court 0.2 papers	substitution of firm	500	\$100.00	Patricia Kakalec
3/1/2018	0.4 Meeting	Meet w/ client re: next steps in case, settlement conference, current pay practices (.4), and sign consent to firm change consent to substitution	500	\$200.00	Patricia Kakalec
3/6/2018	0.1 ECF filing	counsel	500	\$50.00	Patricia Kakalec
3/21/2018	Draft court 0.5 papers	Draft letter requesting extension plus proposed order; ECF file and email to clerk	500	\$250.00	Patricia Kakalec
3/23/2018	Corresponden 0.9 ce	Ltr to Kim re: law, settlement amounts	500	\$450.00	Patricia Kakalec
3/28/2018	0.4 Other	Update damage calculations for 2011	500	\$200.00	Patricia Kakalec

3/30/2018	Draft court 0.9 papers	Check rules, draft settlement letter to J. Fox, send draft to D. Raskin	500	\$450.00	Patricia Kakalec
4/2/2018	0.2 Review	Review settlement offer letter from D counsel; email to co-counsel re: same	500	\$100.00	Patricia Kakalec
4/3/2018	Telephone 0.5 call	TC call w/ client re: settlement conference, email to D. Raskin re: same.	500	\$250.00	Patricia Kakalec
4/4/2018	0.1 Email	Communication w/ client re: settlement conference	500	\$50.00	Patricia Kakalec
4/4/2018	Telephone 0.2 call	Call from client re: conference	500	\$100.00	Patricia Kakalec
4/5/2018	0.4 Other	Update spreadsheet, to D counsel	500	\$200.00	Patricia Kakalec
4/5/2018	0.5 Prepare	Prepare for ct. conference	500	\$250.00	Patricia Kakalec
4/5/2018	RT Travel to 0.8 court	Settlement conference	250	\$200.00	Patricia Kakalec
4/5/2018	4 Attend Court	Settlement conference	500	\$2,000.00	Patricia Kakalec
4/5/2018	0.3 Meeting	Meet w/ client in advance of settlement conference	500	\$150.00	Patricia Kakalec
4/6/2018	Draft court 1.6 papers	Drafting settlement agreement	500	\$800.00	Patricia Kakalec
4/6/2018	Draft court 0.5 papers	Draft confession of judgment	500	\$250.00	Patricia Kakalec
4/6/2018	Draft court 0.2 papers	Consent to MJ jurisdiction	500	\$100.00	Patricia Kakalec
4/9/2018	Draft court 0.2 papers	Check rule, draft notice of voluntary dismissal as to Battery Place Market Milan confession of judgment (.2); to D counsel with other	500	\$100.00	Patricia Kakalec
4/11/2018	Draft court 0.3 papers	settlement docs and consent doc	500	\$150.00	Patricia Kakalec
4/12/2018	Telephone 0.2 call	TC w/ client re: next steps, payment deposits, etc.	500	\$100.00	Patricia Kakalec

4/17/2018	Telephone 0.1 call	TC w/ D. Kim re: settlement papers, MJ consent papers	500	\$50.00	Patricia Kakalec
4/18/2018	0.4 ECF filing	File voluntary dismissal of Battery Place Market (.1); check rules & call clerk re: filing MJ consent; sign and email to judgments clerk. Notices from the court. Edit & re-send MJ consent; email voluntary dismissal	500	\$200.00	Patricia Kakalec
4/18/2018	0.1 Edit/revise	email D counsel re: missing comments or signed agreement	500	\$50.00	Patricia Kakalec
5/1/2018	0.1 Email	TC call from client re: timing, next steps	500	\$50.00	Patricia Kakalec
5/2/2018	0.2 Email		500	\$100.00	Patricia Kakalec
5/2/2018	0.1 Email	Email to/from D counsel re: agreement signature	500	\$50.00	Patricia Kakalec
5/7/2018	0.3 Email	Email w/ D. Kim re: agreement; review changes to agreement & consent, revise agreement & circulate. Meet w/ client to sign & review settlement agreement	500	\$150.00	Patricia Kakalec
5/7/2018	0.5 Meeting		500	\$250.00	Patricia Kakalec
5/14/2018	0.1 Email	Emails w/ D counsel re: getting signed document	500	\$50.00	Patricia Kakalec
5/16/2018	Draft court 1 papers	Cheeks letter Research for Cheeks application	500	\$500.00	Patricia Kakalec
5/21/2018	0.4 Research	Drafting Cheeks application	500	\$200.00	Patricia Kakalec
5/21/2018	0.7 Edit/revise	Emails D counsel re: agreement signatures	500	\$350.00	Patricia Kakalec
5/25/2018	0.1 Email		500	\$50.00	Patricia Kakalec
5/29/2018	Telephone 0.3 call	TC w/ E. Kim re: signed agreement (.1); TC w/ D. Rankin re: same, next steps (.2)	500	\$150.00	Patricia Kakalec

6/11/2018	0.1 Email	Emails w/ D counsel re: settlement agreement	500	\$50.00	Patricia Kakalec
6/13/2018	0.1 Email	Emails w/ D counsel re: settlement agreement	500	\$50.00	Patricia Kakalec
6/13/2018	0.4 Edit/revise	Revise settlement agreement, circulate to D counsel	500	\$200.00	Patricia Kakalec
6/13/2018	Telephone 0.2 call	TC w/ client re: status of agreement, etc.	500	\$100.00	Patricia Kakalec
6/14/2018	0.7 Meeting	Meeting w/ client re: new agreement; circulate to all counsel	500	\$350.00	Patricia Kakalec
6/26/2018	0.3 Edit/revise	Edits to Cheeks letter, to co-counsel	500	\$150.00	Patricia Kakalec
6/28/2018	0.2 Edit/revise	D counsel edits to cheeks letter, emails re: same	500	\$100.00	Patricia Kakalec
6/29/2018	0.8 Prepare	Review & prepare time submission, declaration for Cheeks application; finalize declaration	500	\$400.00	Patricia Kakalec
7/3/2018	Telephone 0.2 call	TC w/ client re: status of agreement, etc.	500	\$100.00	Patricia Kakalec
7/3/2018	0.5 Edit/revise	Finalize Cheeks letter with exhibits, file by ECF	500	\$250.00	Patricia Kakalec
				\$13,950.00	

EXHIBIT 2

(Time 4/26/17 – 1/25/18)

Date	User	Hours	Rate	Activity Tag	Activity Description	Total
	Miriam				Upload Flores Disk and save into dropbox	
4/26/2017	Greenman	0.2	100	Other		\$20.00
	Patricia					
4/26/2017	Kakalec	0.2	500	Open Case		\$100.00
	Patricia					
4/26/2017	Kakalec	0.9	500	Edit/Revise	Edits, add claim to first complaint	\$450.00
					check docket for consent to sue (.1); edit and revise complaint for first amended complaint (1.1); email to D. Rankin attaching complaint (.1)	
4/26/2017	Kakalec	1.3	500	Edit/Revise		\$650.00
	Patricia					
4/26/2017	Kakalec	0.2	500	Draft	Draft consent to sue, English & Spanish	\$100.00
	Patricia					
4/26/2017	Kakalec	0.1	500	Review	Check PACER for other cases against defendants	\$50.00
	Patricia					
4/26/2017	Kakalec	0.8	500	Review	Review file from D. Rankin	\$400.00
	Patricia					
5/1/2017	Kakalec	0.1	500	Email Related	Email w/ D. Rankin re: draft complaint; co-counsel	\$50.00
	Patricia				Edit First Amended Complaint including D. Rankin input.	
5/1/2017	Kakalec	0.4	500	Edit/Revise		\$200.00
	Patricia				Review & edits to co-counseling agreement (.3); email to D. Rankin w/ message re: the same (.1)	
5/1/2017	Kakalec	0.4	500	Review	Edits to co-counsel agreement, sign, email to D. Rankin with email re: questions for client; email from D. Rankin re: TC w/ client	\$200.00
	Patricia					
5/3/2017	Kakalec	0.2	500	Email Related		\$100.00
				Phone Call/Meeting		
5/3/2017	Fabiana Nina	0.4	100	with Client	TC w/ client re: factual Qs for amended complaint	\$40.00
	Patricia				Review consent to sue; email co-counsel re: same w/ edits	
5/19/2017	Kakalec	0.2	500	Review		\$100.00
	Patricia					
5/24/2017	Kakalec	0.1	500	Draft	Draft notice of appearance	\$50.00
	Patricia					
5/24/2017	Kakalec	0.1	500	Email Related	Email w/ D. Rankin re: consent to sue, timing, filing	\$50.00
	Patricia					
5/25/2017	Kakalec	0.5	500	Edit/Revise	Finalize amended complaint, to D. Rankin for filing	\$250.00

5/30/2017	Patricia Kakalec	0.1	500 ECF Related	File notice of appearance	\$50.00
5/30/2017	Patricia Kakalec	0.2	500 Research	online research	\$100.00
5/30/2017	Miriam Greenman	0.2	500 Review	Review answer (.2); email D. Rankin re: same	\$100.00
				Saving new documents	
6/1/2017	Miriam Greenman	0.5	Saving documents to 130 file (online)	pulling old documents from pacer and saving to file Email w/ D. Rankin re: conference (.1); TK check local rules and J. Carter rules re: submitting proposed schedule (.2)	\$65.00
6/26/2017	Patricia Kakalec	0.1	500 Email Related	TC w/ D. Rankin re: upcoming conference	\$50.00
6/27/2017	Patricia Kakalec	0.3	500 Confer		\$150.00
6/28/2017	Patricia Kakalec	0.1	500 Phone call/meeting	Attempted conference call w/ D. Kim & D. Rankin with co-counsel after conference	\$50.00
6/29/2017	Patricia Kakalec	0.3	500 Attend meeting		\$150.00
6/29/2017	Patricia Kakalec	0.4	500 Court - Conference	Initial pretrial conference	\$200.00
6/29/2017	Patricia Kakalec	0.8	250 Travel Related	Travel to/from conferene	\$200.00
7/8/2017	Patricia Kakalec	0.2	500 Review	Review proposed amended complaint (.1); email w/ D. Rankin re: same (.1)	\$100.00
7/11/2017	Patricia Kakalec	0.3	500 Review	Review 2d amended complaint new draft; my edits; email back to D. Rankin explaining edits.	\$150.00
7/11/2017	Patricia Kakalec	0.3	500 Review	Review 2d amended complaint with changes; email to D. Rankin re: my comments.	\$150.00
7/13/2017	Miriam Greenman	0.2	Saving documents to 100 file (online)		\$20.00
7/20/2017	Patricia Kakalec	0.6	Document Production 500 Related	Draft initial disclosures (.4); emails w/ D counsel re: confer before conference (.2)	\$300.00
7/24/2017	Patricia Kakalec	0.3	Attend Telephone 500 Conference	Attend Telephone Conference	\$150.00
7/24/2017	Patricia Kakalec	0.4	500 Draft	Draft	\$200.00

8/11/2017	Patricia Kakalec	0.5	Court Document 500 Related	begin document requests and interrogatories	\$250.00
8/13/2017	Miriam Greenman	0.1	Saving documents to 130 file (online)	Saving documents to file (online)	\$13.00
8/15/2017	Patricia Kakalec	0.4	Court Document 500 Related	Drafting interrogatories Finish interrog and document requests to D.	\$200.00
8/16/2017	Patricia Kakalec	2.2	Court Document 500 Related	Rankin	\$1,100.00
8/17/2017	Patricia Kakalec	0.2	Document Production 500 Related	review and add D. Rankin edits to discovery send discovery and email to D counsel (.2); review discovery before sending (.3)	\$100.00
8/18/2017	Patricia Kakalec	0.5	Document Production 500 Related		\$250.00
8/28/2017	Patricia Kakalec	0.2	500 Email Related	email re missing docs	\$100.00
9/7/2017	Patricia Kakalec	0.2	Correspondence with 500 Opposing Counsel	email w/ D. Rankin re initial disclosure non-response Review/edits to ltr. to opposing counsel; email w/ co-counsel re: same email D. Kim re meet and confer (.1); review draft agreement (.5)	\$100.00
9/15/2017	Patricia Kakalec	0.2	500 Edit/Revise		\$100.00
9/27/2017	Patricia Kakalec	0.6	500 Review		\$300.00
10/2/2017	Patricia Kakalec	0.2	Correspondence with 500 Opposing Counsel	emails with D. Kim re discovery response quick review of produced materials	\$100.00
10/3/2017	Patricia Kakalec	0.2	500 Review		\$100.00
10/4/2017	Patricia Kakalec	0.2	Correspondence with 500 Opposing Counsel	emails from D with discovery, quick review	\$100.00
10/17/2017	Patricia Kakalec	0.4	500 Review	review J and MJ rules, review order re: settlement conference, complete attendance sheet, email CoC re conference	\$200.00
10/18/2017	Patricia Kakalec	1.3	500 Other	damage calculations/excel - spreadsheet of hours and other	\$650.00
10/18/2017	Patricia Kakalec	0.4	Drafting Court 500 Documents	draft letter to court for conference	\$200.00
10/19/2017	Patricia Kakalec	0.3	500 Research	complete spread calc	\$150.00
10/19/2017	Patricia Kakalec	1	Settlement/Negotiatio 500 n Related	complete and edits to settlement letter	\$500.00

	Patricia			review new docs from Def	
				(.2); TC with D. Rankin (.4);	
				TC with Def Counsel (.3);	
				research mixed tip work (.7);	
				draft section on tipped work	
				(.3); edits to letter to reflect,	
10/19/2017	Kakalec	2.2	500 with Opposing Counsel	send to DR (.3)	\$1,100.00
	Patricia		Drafting Court	Draft model settlement to	
10/20/2017	Kakalec	0.3	500 Documents	bring to conference	\$150.00
				damage calc based on DR	
				summary (.9); emails with	
				CoC re damage calc (.2);	
				edits to letter, incorporating	
10/20/2017	Kakalec	1.3	500 Review	#s (.2)	\$650.00
	Patricia			review order rescheduling,	
10/20/2017	Kakalec	0.1	500 Review	email re same	\$50.00
	Patricia		Settlement/Negotiatio		
10/24/2017	Kakalec	0.3	500 n Related	blank settlement agreement	\$150.00
	Patricia		Settlement/Negotiatio	email with CoC re	
10/25/2017	Kakalec	0.1	500 n Related	settlement demand	\$50.00
	Miriam			Drafting Fees and Expenses	
10/29/2017	Greenman	0.4	100 Draft	documents	\$40.00
	Miriam				
10/30/2017	Greenman	0.2	100 Edit/Revise	time report	\$20.00
	Patricia		Settlement/Negotiatio		
10/30/2017	Kakalec	0.1	500 n Related	email with settlement offer	\$50.00
	Patricia		Correspondence with	emails to/from D Counsel re	
10/30/2017	Kakalec	0.2	500 Opposing Counsel	settlement, conference	\$100.00
				TC with D. Rankin re	
				adjournment request (.2);	
				letter to court re	
				adjournment request (.5);	
10/30/2017	Kakalec	0.9	500 Documents	ECF letter (.2)	\$450.00
	Patricia		Correspondence with	review letter from D.	
10/31/2017	Kakalec	0.1	500 Opposing Counsel	Counsel	\$50.00
	Patricia			review discovery responses,	
11/7/2017	Kakalec	1.2	500 Review	draft letter re: deficiencies	\$600.00
				research case on disc.	
				response (.3); emails with D.	
				Rankin re response to disc	
				(.1); edits to letter (.3); send	
11/8/2017	Kakalec	0.8	500 Opposing Counsel	to D counsel (.1)	\$400.00

11/15/2017	Patricia Kakalec	0.2	500 Research	Check order & local rules re: discovery non-compliance, email D. Rankin re: same	\$100.00
11/16/2017	Patricia Kakalec	0.8	Phone Call/Meeting 500 with Opposing Counsel	Review discovery ltr before call (.1); TC w/ Daniel Kim re: discovery, damages (.4); email to D. Rankin summarizing same (.1); email cites to D. Kim (.1); email confirmation to D. Kim (.1)	\$400.00
11/20/2017	Patricia Kakalec	0.5	Revise/Edit Court 500 Documents	Edits to motion to compel letter (.4); email w/ D. Rankin re: same (.1)	\$250.00
11/27/2017	Patricia Kakalec	0.4	Revise/Edit Court 500 Documents	edit to discovery letter, ECF with exhibits	\$200.00
12/8/2017	Patricia Kakalec	0.1	500 Confer	email with CoC re motion on discovery	\$50.00
12/22/2017	Patricia Kakalec	0.3	500 Review	Review D counsel letter to court (.1); email w/ co-counsel re: discovery, next steps, timing (.2)	\$150.00
12/31/2017	Miriam Greenman	0.1	Saving documents to 100 file (online)	Def response to Doc Requests	\$10.00
1/10/2018	Miriam Greenman	0.1	Saving documents to 100 file (hard copies)	saving files	\$10.00
1/15/2018	Patricia Kakalec	3.7	Phone Call/Meeting 500 with Client	3.2 Meet w/ Luis Flore to prep for deposition .5 review D docs in advance of dep prep	\$1,850.00
1/16/2018	Patricia Kakalec	6.1	500 Attend Deposition	Meet w/ client to prep for deposition (.5) Deposition of Luis Flores: 5.6 hours (.6 waiting for deposition to start; .5 meet with client during deposition break; 5 hours deposition)	\$3,050.00
1/17/2018	Patricia Kakalec	0.4	Correspondence with 500 Client	review ct. order re: extension of time (.1); review ct. order re: changing settlement conference date (.1); email to D. Rankin re: deposition (.1); text w client re: settlement conference date (.1)	\$200.00

Miriam		Calendaring/Schedulin		
1/25/2018 Greenman	0.3	100 g	calendaring depositions	\$30.00
				\$19,668.00
			Breakdown:	
			Patricia Kakalec	19,398.00
			Miriam Greenman	230.00
			Fabiana Nina	40.00